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Attorneys for Defendant Meta Platforms, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

IN RE META PIXEL TAX FILINGS
LITIGATION,

This Document Relates To:

Case No. 5:22-cv-07557-PCP, All Actions

Case No. 5:22-cv-07557-PCP

**DECLARATION OF LAUREN R.
GOLDMAN IN SUPPORT OF
DEFENDANT'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL SHOULD
BE SEALED**

The Honorable P. Casey Pitts

I, Lauren R. Goldman, state and declare as follows:

1. I am an attorney licensed to practice in the State of New York. I am a partner at the law firm Gibson, Dunn & Crutcher LLP, counsel of record for Defendant Meta Platforms, Inc. (“Meta”) in these actions. I am admitted *pro hac vice* to practice before this Court.

2. I submit this declaration under Local Rule 79-5(f) in support of Defendant’s Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed.

3. Meta moves to file the Opposition to Plaintiffs’ Motion for Voluntary Dismissal of plaintiff Crystal Craig and the Declaration of Natalie Hausknecht partially under seal at plaintiffs’ request because it contains information plaintiffs designated confidential.

4. Attached as **Exhibit 1** is a true and correct copy of Meta’s Opposition to Plaintiffs’ Motion for Voluntary Dismissal of Plaintiff Crystal Craig.

5. Attached as **Exhibit 2** is a true and correct copy of the Declaration of Natalie Hausknecht.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this the 20th day of June 2025 in New York, New York.

Document	Portion(s) to Sealed
Meta’s Opposition To Plaintiffs’ Motion for Voluntary Dismissal of Plaintiff Crystal Craig	Page 3, lines 20-23.
Declaration of Natalie Hausknecht	Page 1, lines 22-25.

/s/ Lauren R. Goldman
Lauren R. Goldman